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8 *Attorneys for Defendants*  
9 *Las Vegas Metropolitan Police Department,*  
*Sergeant Justin Byers, Officer Richard Nelson,*  
10 *Officer Jonathan Carrington, and Officer Lukas Ferris*

11 UNITED STATES DISTRICT COURT

12 DISTRICT OF NEVADA

13 JAMES IIAMS, individually and AMANDA  
MATTHEWS, individually,

14 Plaintiffs,

15 vs.

16 LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT, a political subdivision of the  
17 State of Nevada; SERGEANT JUSTIN  
BRYERS; OFFICER RICHARD NELSON;  
18 OFFICER JONATHAN CARRINGTON;  
OFFICER LUKAS FERRIS; and DOE  
19 OFFICERS I-XX,

20 Defendants.

CASE NO.: 2:18-cv-00231-RFB- DJA

**STIPULATION TO RESPOND TO  
EMERGENCY MOTION TO ENFORCE  
SETTLEMENT  
(First Request)**

21 The above-referenced parties, by and through their counsel of record, hereby agree and  
22 request that the deadline for Defendants to respond to Plaintiff's Emergency Motion to Enforce  
23 Settlement be extended to November 19, 2021.

24 On November 10, 2021 Plaintiff filed an Emergency Motion to Enforce Settlement.

[ECF No. 126]. This Court issued a Minute Order on November 12, 2021 advancing the briefing on the Motion and requiring Defendants' response to the Motion be filed by November 17, 2021. The brief extension is requested as Counsel will be out of the office part of next week, including the November 17<sup>th</sup> filing date. Under the circumstances, Plaintiff has graciously agreed to allow two additional days for filing. As such, the parties respectfully request that the Court allow Defendants an additional two (2) days to prepare the appropriate response.

DATED this 15<sup>th</sup> day of November, 2021.

KAEMPFER CROWELL

CLEAR COUNSEL LAW GROUP

By: /s/ Lyssa S. Anderson  
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*Las Vegas Metropolitan Police*  
*Department, Sergeant Justin Byers,*  
*Officer Richard Nelson, Officer*  
*Jonathan Carrington, and Officer*  
*Lukas Ferris*

**ORDER**

**IT IS SO ORDERED.**

Dated this 16th day of November, 2021

  
 DANIEL J. ALBREGTS  
 UNITED STATES MAGISTRATE JUDGE

**Luisa Cota**

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**From:** Jared Richards <jared@clearcounsel.com>  
**Sent:** Friday, November 12, 2021 6:01 PM  
**To:** Wendy Applegate  
**Cc:** Lyssa Anderson; Kristopher Kalkowski; Luisa Cota; Terri Szostek; Dustin Birch  
**Subject:** RE: LVMPD/Iiams

I approve. Please use my e-signature.

Sent via the Samsung Galaxy S20+ 5G, an AT&T 5G smartphone

----- Original message -----

From: Wendy Applegate <WApplegate@kcnvlaw.com>  
Date: 11/12/21 3:26 PM (GMT-08:00)  
To: Jared Richards <jared@clearcounsel.com>  
Cc: Lyssa Anderson <landerson@kcnvlaw.com>, Kristopher Kalkowski <KKalkowski@kcnvlaw.com>, Luisa Cota <LCota@kcnvlaw.com>  
Subject: LVMPD/Iiams

[EXTERNAL]

Mr. Richards:

Attached is the proposed Stipulation with regard to the deadline to respond to the Motion to Enforce Settlement. Please let us know if approved for filing.

Thank you

**KAEMPFER**

**CROWELL**

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